

From: Jay Smith
To: steve.bollinger@gm.com
Cc: David A Wright; david.w.schrumpf@gm.com; randall.c.harvey@gm.com; Stephen Healy; steven.j.fornetti@gm.com; Daniel Cullen; Peter Caffrey
Subject: Re: Preliminary 2014 VECI Labels with HD GHG Content for Incomplete Vehicles Engine Dyno Certified
Date: 12/20/2012 03:26 PM
Attachments: [00016.pdf](#)
[ExamplesCombinedEngVehLabels.pdf](#)

Steve,

Are you saying that engine-dyno certified engines (either SI or CI) do not have a compliance label on the engine, or are you saying that the engine is labelled but you also include the engine information on the vehicle label? If its the the prior, I don't think either our group or the SI group would approve of that. The note from 2005 only seems to clarify that its fine to include evap information on the engine label, which is typically not a problem. Please clarify and we can go from there.

The "exempt" labelling comment was only a suggestion to avoid trouble with our enforcement division, should you choose not to certify until 1/1/2014. If all your 2014 MY are going to be certified to Part 1037, you will not need the "exempt" label.

Jay Smith

James D. Smith, Ph.D.
Mechanical Engineer
Compliance Division
Office of Transportation & Air Quality
US Environmental Protection Agency
2000 Traverwood Dr.
Ann Arbor, MI 48105

Office Phone: 734-214-4302

▼ [steve.bollinger---12/20/2012 02:51:56 PM---Jay, I assumed that since EPA had granted GM approval to use a combined label](#)

From: steve.bollinger@gm.com
To: Jay Smith/AA/USEPA/US@EPA
Cc: Stephen Healy/AA/USEPA/US@EPA, randall.c.harvey@gm.com, David A Wright/AA/USEPA/US@EPA, david.w.schrumpf@gm.com, steven.j.fornetti@gm.com
Date: 12/20/2012 02:51 PM
Subject: Re: Preliminary 2014 VECI Labels with HD GHG Content for Incomplete Vehicles Engine Dyno Certified

Jay,

I assumed that since EPA had granted GM approval to use a combined label for our HD SI (gasoline fueled) engines certified using the engine

dynamometer process it would be possible to use a combined label for GM's HD CI (diesel fueled) engines certified using the engine dynamometer process. (Why would EPA want GM to treat CI engines differently than SI engines with respect to labeling?) GM obtained approval to use a combined engine and vehicle information label from EPA on August 25, 2005 in an Email from Han Lim to Don Seaton which I have attached to this email. I have also attached representative copies of the combined label that GM has been using since that approval was granted.

All GM's vocational vehicles fall into the <19,500 GVWR Vocational Vehicle sub-category and therefore vehicle GHG compliance is only determined by tire rolling resistance. GM's plan is to have one GHG Vehicle Family to cover all <19,500 GVWR Vocational Vehicles with subfamilies for each available tire offered on vehicles in the Vehicle Family. The label examples I sent with the original email are missing the Vehicle Family Name. I will have GM's Label Engineer add the Vehicle Family name to the labels and resubmit them with this correction. Since the engineer that needs to revise the labels is on vacation, I will not be able to send the revised labels until after Jan 2, 2013.

I reviewed the label regulatory language and both paragraphs 1036.135(d) and 1037.135 (e) provide EPA with the regulatory authority to approve this request. As a matter of fact, both paragraphs state that EPA "will approve" alternate labels if they are "consistent with the requirements." I believe that our proposed alternate labels are consistent with all the label requirements. I do not understand your conclusion that separate labels are necessary. If I have missed the regulatory statement that requires this please cite the subsection so I can consult it and follow that direction.

GM needs to continue with a combined label format for our Diesel fueled engines that are certified using the engine dynamometer process for the following reasons.

1. GM has no identified locations to place a second label on the vehicle.
2. For error proofing between builds of GM complete and incomplete vehicles which are assembled on the same manufacturing lines,
3. GM needs to maintain common process.
4. The accelerated implementation for these HD GHG regulations lead GM to take the approach of modifying an existing label rather than create and tool up a second label.

It was GM's plan that we would add the new vehicle related HD GHG content to the Engine label and rename the label as shown in the sample labels in my original submission. GM installs all Important Engine Information, Vehicle Emission Control Information, and combined Important Engine Information and Vehicle Emission Control Information labels at GM vehicle assembly plants. It is GM's intention to certify all 2014 vocational vehicles at the start of the vehicle model year and not wait until 01/01/2014. Therefore I don't believe that we are required to make the exempt statement on our labels.

Today GM receives a separate certificate of conformity for the vehicle specific evaporative emissions family and the engine families which are used in those vehicles and GM is currently using a combined label.

If EPA has established any guidelines for the vehicle family naming, could you please forward? This could save some time in iterating to the final label configuration since the name we are planning to submit on the revised labels is GM's vision of what the name should look like and may not meet EPA's expectations.

Steve Bollinger
Total Compliance Engineer
248-830-8342
Milford Proving Grounds
Building 31E-123

From: Smith.Jay@epamail.epa.gov
To: steve.bollinger@gm.com
Cc: randall.c.harvey@gm.com, william.w.watson@gm.com, Healy.Stephen@epamail.epa.gov, Wright.DavidA@epamail.epa.gov
Date: 12/14/2012 09:01 AM
Subject: Re: Preliminary 2014 VECI Labels with HD GHG Content for Incomplete Vehicles Engine Dyno Certified

Steve,

I'm still a little unclear about this, since the engine label should be on a permanent, readily visible part of the engine (per §86.007-35(a)(3)(i)&(ii)). Since the vehicle and engine are certified independently and carry their own certificates of conformity for this category of vehicle, we expect to see separate labels, and the vehicle would only need to be labeled per §1037.135. Conceivably, all your vehicles certified to §1037.105 in the "<19,500 vocational" category could be in the same vehicle family, regardless of the engine, which is only one reason why separate labels are necessary.

Also remember that all vehicles subject to 40 CFR Part 1037 are required to be certified to the GHG standards beginning 01/01/2014 regardless of engine type/fuel (including any gasoline-powered vehicles that are GEM-certified). For MY2014 production prior to that date, the vehicles must be labelled as exempt according to §1037.150(g).

Sincerely,

Jay Smith

James D. Smith, Ph.D.
Mechanical Engineer
Compliance Division
Office of Transportation & Air Quality
US Environmental Protection Agency
2000 Traverwood Dr.
Ann Arbor, MI 48105

Office Phone: 734-214-4302

From: steve.bollinger@gm.com
To: Jay Smith/AA/USEPA/US@EPA
Cc: randall.c.harvey@gm.com, william.w.watson@gm.com
Date: 12/11/2012 04:23 PM
Subject: Re: Preliminary 2014 VECI Labels with HD GHG Content for Incomplete Vehicles Engine Dyno Certified

Jay as an integrated manufacturer using GM engines in GM vehicles the labels cover both engine and vehicle labeling requirements (additional vehicle labeling requirements are being driven by GHG regulations). Labels that we would supply for engines being shipped to our OEM customers would be engine only (Important Engine Information) labels and the OEM would be responsible for any vehicle labeling requirement.

This may be the first time we have submitted a combined diesel engine and vehicle label since up until now our diesel engines have only been required to meet engine requirements. GM has been using combined engine and vehicle labels for our gasoline fueled engines for many years, (since at least 2006 MY) as there are vehicle specific evap emission labeling requirements.

Steve Bollinger
Total Compliance Engineer
248-830-8342
Milford Proving Grounds
Building 31E-123

From: Smith.Jay@epamail.epa.gov
To: steve.bollinger@gm.com
Cc: randall.c.harvey@gm.com, william.w.watson@gm.com
Date: 12/11/2012 03:55 PM
Subject: Re: Preliminary 2014 VECI Labels with HD GHG Content for Incomplete Vehicles Engine Dyno Certified

Hello Steve,

Can you clarify if these are the engine labels (for the engine dyno certified engines) or the vehicle labels (certified to part 1037 for GHG emissions)? They seem to be a little of both(?).

Jay Smith

James D. Smith, Ph.D.
Mechanical Engineer
Compliance Division
Office of Transportation & Air Quality
US Environmental Protection Agency
2000 Traverwood Dr.
Ann Arbor, MI 48105

Office Phone: 734-214-4302

From: steve.bollinger@gm.com
To: Jay Smith/AA/USEPA/US@EPA
Cc: william.w.watson@gm.com, randall.c.harvey@gm.com
Date: 12/11/2012 03:41 PM
Subject: Preliminary 2014 VECI Labels with HD GHG Content for Incomplete Vehicles Engine Dyno Certified

Jay, I have attached GM's production intent VECI Labels for our vehicles and engines using the 6.6L Duramax Diesel. While the statements on these labels do not exactly match the statements specified in the regulations due to space constraints, GM believes that the labels are configured to present all the information required by the regulations.

I will be submitting these labels as the final version with our 2014 application for certification.

Please reply to this email or call if you have any questions or comments.

Steve Bollinger
Total Compliance Engineer
248-830-8342
Milford Proving Grounds
Building 31E-123

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